

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 04-30070-MAP

PETER K. FREI,	)
Plaintiff	)
	)
vs.	)
	)
TOWN OF HOLLAND, BOARD OF HEALTH,	)
HOLLAND CONSERVATION COMMISSION,	)
HOLLAND POLICE DEPARTMENT,	)
PLANNING BOARD, ZONING BOARD OF	)
APPEALS, Ronald Benoit, Debra Benveniste,	)
Sally Blais, Richard Blease, Harold E. Congdon,	)
Robert Dymon, Robert Ford, Kevin Gleason,	)
Benjamin Haller, William Hardy, Earl Johnson,	)
Helen Kreiger, Marilyn LaPlante, Joanne May,	)
Vincent J. McCaughey, Dora Metrelis,	)
Arthur A. Quinn, Brian Roche, John Stevens,	)
Defendants	)

**AFFIDAVIT OF DOROTHY VARON, ESQ.**

I, Dorothy Varon, Esq., first being duly sworn, do hereby depose and say:

1. I am an attorney in good standing duly licensed in the Commonwealth of Massachusetts and admitted to practice in the United States District Court, District of Massachusetts.

2. At all times relevant to this matter, I have been co-counsel with Attorney Nancy Frankel Pelletier to the defendants in the above-captioned matter.

3. I have personally reviewed Robinson, Donovan's electronic time keeping log to calculate the total number of hours I or Attorney Pelletier has spent in preparing an answer to the complaint.

4. I personally meet with and/or talked to all of the defendants who were available. Where I was unable to reach a defendant I relied on information obtained from other defendants with personal knowledge.

5. If I was unable to reach a defendant or unable to obtain information from other defendants in providing a response to any specific allegation, the answer indicates that the defendants are unable to answer because they are without sufficient information and that they leave the plaintiff to his burden of proof.

6. I have discussed with Attorney Pelletier her attempts to locate certain public records at the Hampden County Superior Court Clerk's office relevant to certain allegations in the complaint as well as her efforts in collecting information to assist in answering the complaint.

7. In total, Attorney Pelletier and I have spent approximately 30 hours interviewing defendants, reviewing documents and responding to the complaint and have made all reasonable efforts to answer each of the 833 paragraphs in the complaint.

Signed under the pains and penalties of perjury this 15<sup>th</sup> day of October, 2004.

/s/ Dorothy Varon  
Dorothy Varon, Esq.